

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

)

)

)

**Case No. 07 C 6157**

)

**Judge Grady**  
**Magistrate Judge Nolan**

)

)

**DEFENDANT'S MOTION FOR EXTENSION OF TIME  
TO FILE REPLY BRIEF**

Now comes Defendant, the Village of Willow Springs, Alan Nowaczyk and Annette Kaptur, by their attorneys, Odelson & Sterk, Ltd. and John Murphey, and respectfully request an extension of time to file their Reply in support of their Motion to Dismiss, and in support state as follows:

1. Defendants have filed a Joint Motion to Dismiss and Memorandum in Support.
2. Defendants have also filed a Motion for Sanctions.
3. Plaintiff has filed her Response to the Motion to Dismiss and Motion for Sanctions.
4. On April 2, 2008, this Court entered an order denying Defendants Motion to Strike Plaintiff's Response and ordered Defendants to file their Reply by April 16, 2008.
5. Defendants have been working on their Reply but will not be able to complete the Reply by April 16, 2008 because of the following:
  - (I) Counsel for the Village has been involved in extensive discovery on the matter of Duran v. School District 229, 06 L 003480.

- (ii) Counsel for the Village is completing a Motion for Summary Judgment in the matter of Owens v. City of Calumet City, 06 C 3276, which is due on April 23, 2006.
- (iii) Defendant Nowaczyk and Kaptur's attorney, John Murphey, has been preparing for trial in the matter entitled Coary v. City of Northlake, 06 L 3747, and said trial is set to begin on April 15, 2008.
- (iv) Based upon the above, the attorneys representing the Village and individual defendants have been unable to confer on preparation of their Joint Reply in Support of their Motion to Dismiss.

6. This motion is not being brought to cause any undue delay or prejudice to Plaintiff.

7. Defendants request an extension of time to file their Joint Reply up to and including April 25, 2008.

WHEREFORE, Defendants pray that this Court enter an order granting Defendants an extension of time to file their Reply in Support of their Motion to Dismiss by April 25, 2008.

Village of Willow Springs

By: /s/Michael J. McGrath

/s/John Murphey

Michael J. McGrath  
**ODELSON & STERK, LTD.**  
3318 West 95<sup>th</sup> Street  
Evergreen Park, IL 60805  
708-424-5678